Furthermore, it cannot be said that it would be obvious to combine the structures of Figure 4a with Figure 3a since Figure 3a is a nSCR and Figure 4a is a pSCR. There is not suggestion in Ker of combining a p-type SCR with an n-type SCR to come up with a structure that has both a n+ and a p+ floating region 54, 54'.

Response to Arguments:
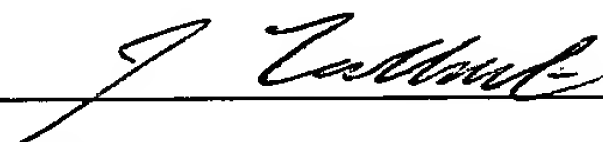
This was addressed above.

As discussed above, it is not correct that a p-n junction requires a direct contact between one p+ region and at least one of the n+ regions. What is required is that the n+ and p+ regions not be isolated from each other. The p+ region in this case is formed in a p-well which directly contacts the n+ region. The p+ region therefore through the p-well has the necessary contact with the n+ region to define a diode.

In light of the above distinctions over Ker which fails to include explicit limitations of the claims and fails to suggest the addition of such additional n+ and p+ regions in the p-well, it is respectfully submitted that the claims are distinguishable over Ker and that the final office action does not present valid new grounds for rejection. Allowance of the claims or a formal telephone interview with the examiner and his supervisor is respectfully requested.

Applicant can be reached by telephone at 408-667 1289 or at jvollrath2000@yahoo.com to set an interview time should an interview time be necessary.

Respectfully Submitted,

Dated: _____ 8/22/, 2005   _____

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